

In the United States District Court Of
The Middle District of Alabama
Eastern Division

RECEIVED

2007 NOV 27 A 9:46

Plaintiff,

William Lanier Ellis Jr.

Defendant,

Tina Riley, Dr. Spud Warr

Case # 3:07-cv-920 MHJ
JON R. RACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

Motion to Amend Complaint

Comes now the Plaintiff on this 21st day
of November, 2007. Seeks to Amend the original Complaint.

Grounds,

(A) That relief will not be granted to Plaintiff
with out this Honorable Courts full intervention.

(B) Defendants have Shown their lack of respect
to these Proceedings, Furthermore holds Contempt for the
authority of this Court.

(C) The Plaintiff is entitled to monetary Damages
and relief, for his pain and suffering.

(O)

(D) In light of this Courts authority to intervene when serious Bodily injury is at risk. The Plaintiff has been further injured. On 11-20-07 Due to Carelessness of staff.

(E) These injuries further inhibit the plaintiff's already depleted activity.

Discussion

The Plaintiff Comes in good Cause for relief. In light of the numerous visits to the Defendants for relief. The Plaintiff has Shamelessly asked and even begged for relief of his suffering. Although trivial efforts by the Defendants have been made it is undoubtably Clear No relief that is reasonable between the two parties Can be reached.

As in accordance with this Courts order the Plaintiff has, So been advised to resolve my issue with this Court by the Administrator of this facility. The Grievance was filed 10/23 and returned on 10/27 advising the Plaintiff to desist from harassing Medical Staff. Every Complaint has been submitted to the defendants in writing. The procedures are exhausted as ordered by this Court. On 11-20-07 the Plaintiff suffered another back injury. Staff intensionally busted a water bag in the middle of the dormitory to punish the whole dorm rather than the individual.

The Plaintiff not having knowledge of this until he went to use the phone and slipped and fell in the puddle of water. The Plaintiff was taken to a holding Cell

Parked in a wheelChair dropping wet in severe pain and told that if the nurse said i could go to the Hospital i would go. Approximately an hour and 45 minutes later im pulled out threatened and harassed.

With that said the officer accompanying the Plaintiff (officer STHIL) is not happy about this. Now im being snatched on and pulled at. I obey the orders given when the restraint belt is put on me its put on so tight its buckling my legs. The Plaintiff is presented with a Choice This way or no way.

These officers have little respect for the very laws they uphold. Arriving at the hospital at 9.05 pm the Plaintiff is admitted. Now im being interrogated about my Criminal Proceedings and my Crime. Its a no win situation all i Came for was medical treatment.

My Blood pressure was 153/100 and im asked if i suffer from high Blood pressure. I answer the nurse and tell her its been high lately. The following morning Dr. warr comes in and wants to know what happened by way of the medical officer but no follow up on this incident is done.

The Plaintiff has motioned to this Court twice for Counsel and was denied. The Plaintiff wants this Honorable Court to make it known for the record he fears for his very life and at some point staff will take out their anger upon him for these proceedings

Those persons responsible for further injury to the plaintiff. Those persons be held accountable. This was a malicious act and a mocking act of punishment. Furthermore it is unprofessional and careless.

The plaintiff seeks monetary damages that he is entitled to. Each and everyday he has been purposely made to suffer terrible pain to date, some 3½ months. That he be awarded Five Hundred Dollars per day and no less than One Million Five Hundred Thousand dollars for the act of personal injury about his person, namely, further irreversable injury to the plaintiff's back. Oct 11-20-07

The plaintiff asks that the administration of this facility be annexed into the record. Furthermore seeks Counsel, to protect his Constitutional Rights and to ensure his safety to avoid further injury. Those holding Custody of him refuse him any provisioned study time in the facility library in fact the plaintiff can't even get a response on inmate requests for time in the Law Library.

Furthermore true and original documents the plaintiff needs to provide this Honorable Court to clarify and update this proceeding. Those having Custody of him refuse to furnish any Copy's of, Medical request, regular request, and Guidance is so less Court may have full knowledge of the plaintiff's request for relief and monetary damages that the plaintiff is entitled.

Conclusion

There are a small fraction of events around and about the plaintiff. You have to conclude that this is a real problem. Either with those persons, or administration and guidelines. Certainly every institution has to have guidelines to govern its inmates.

These are the kind of break down in the system

that put peoples lives at risk. Furthermore this is a deep rooted problem that will not go away. Moreover the Plaintiff would like the Conclusion to involve, Case # 74447 from the U.S. Department of Health and Human Services. Received on Oct 25 2007, Returred Oct 30, 2007 upon Recipt of my Correspondence (OCCR) Office for Civil Rights, Currently is investigating this facility to decide if they have the authority to take action. By way of Roosevelt Freeman, Regional Manager, Also a formal Complaint with the national Epilepsy Foundation 8301 Professional Place, Landover MD 20785.

The Plaintiff has good Cause to have this motion granted By this Honorable Court and with due respect Close this motion.

Respectfully Submitted, the 21st day of November.

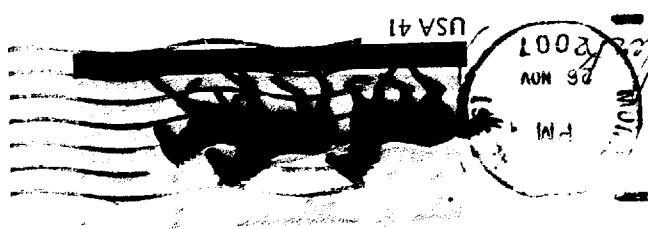
Signed, William Lanier Ellis Jr.

Certificate of Service. I William Lanier Ellis Jr. have hand delivered a true and exact copy of this document to the Defendants.

William Lanier Ellis Jr.

for mail
3610140711-11 2007

9.0 Box 711, Montezuma, Alabama, 36101
Should be tall & cut out



3610140711-11
Montgomery, AL
P.O. Box 64640
Q. William E. Lee